

Exhibit 183

Plaintiffs' Corrected Averment of Jurisdictional Facts and
Evidence and/or Statement of Facts as to Defendant Al Rajhi Bank
Pursuant to Rule 56.1

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD) (SN) ECF Case
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This document relates to:

Underwriting Members of Lloyd's Syndicate 2, et al. v. Al Rajhi Bank, et al., No. 16-cv-07853
Addesso, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09937
Aguilar, et al. v. Kingdom of Saudi Arabia, et al., No. 16-cv-09663
Hodges, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00117
Aiken, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-00450
Charter Oak Fire Insurance Co., et al. v. Al Rajhi Bank, et al., No. 17-cv-02651
Abarca, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03887
Arrowood Indemnity Co., et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-03908
Abedhajajreh, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-06123
Muenchener Rueckversicherungs-Gesellschaft Aktiengesellschaft in Muenchen, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-07914
Abbate, et al. v. Kingdom of Saudi Arabia, et al., No. 17-cv-08617

DECLARATION OF BEN T. RAILSBACK

I, Ben T. Railsback, hereby declare under penalty of perjury the following:

1. I am the principal engineer of Critical Guidance Engineering, which I founded in 2018. I was formerly employed by Knott Laboratory from 2000 through 2018. Both Critical Guidance Engineering and Knott Laboratory provide engineering analysis and visualization/animation services. I regularly create animations, 3-D visualizations and computer models based on my inspections and measurements of physical objects and have done so throughout my career.
2. I am a Registered Professional Engineer (P.E.) in the states of Colorado (CO), Missouri (MO), Pennsylvania (PA), and New York (NY). I am Board Certified in Forensic Engineering by the National Academy of Forensic Engineers (NAFE). I am registered with the National Counsel of Examiners for Engineering and Surveying (NCEES), and I am an Accredited Accident Reconstructionist by the Accreditation Commission of Traffic Accident Reconstruction

(ACTAR). I have a Master of Science degree (M.S.) in Engineering Systems from the Colorado School of Mines (2000) and a Bachelor of Science degree (B.S.) in Engineering, Mechanical Specialty, from the Colorado School of Mines (1998). My CV is attached to this affidavit as Exhibit A and incorporated by reference herein.

3. I have been qualified and testified as an expert in the areas of mechanical engineering, safety engineering, and visualization/animation. I have used modeling, computer aided drafting programs, graphics packages and animation/visualization throughout my career to analyze incidents and demonstrate opinions.¹ My analysis is based on reasonable and accepted mechanical engineering and visualization methodologies and the opinions expressed in this affidavit are stated to a reasonable degree of engineering certainty.

4. I was asked by Plaintiffs' counsel in the 9/11 litigation (Robert Sheps of the Sheps Law Group) to analyze a set of Saudi currency that was in circulation during the 1998-1999 time-period, specifically the 50, 100, and 500 Saudi Riyal paper banknotes. I was instructed to evaluate and take precise measurements of these Saudi banknotes to provide 3-D visualizations of two different total amounts: (1) 1,259,430 Saudi Arabia Riyals ("SAR"), and (2) 14,798,020 Saudi Arabia Riyals ("SAR"). More specifically, I was asked to create visualizations for what these two different amounts would look like using varying combinations of the 50,100 and 500 SAR banknotes.

5. In this Declaration I set forth the specific software and methodologies I have used to approach this assignment and create my work product. I am submitting demonstrative Exhibits

¹ The digital visualization of an inanimate item, such as paper currency, is considerably less complex than what I would typically be requested to create. I often provide detailed video visualizations based upon two objects moving in different directions at excessive rates of speed, sometimes with depictions of occupants inside being impacted.

with my Declaration in the form of a series of digital diagrams depicting real and accurate visualizations of these two different amounts of currency, presenting them in five different “views” of combinations of the 50,100 and 500 Saudi Arabia Riyal banknotes.

WORK METHODOLOGY and PROCESSES

6. I was able to personally examine and measure several different original Saudi Riyal notes that were in circulation from 1983-1999 that were provided to me.² I analyzed these banknotes using typical procedures to develop digital models. I utilized digital photography to document actual representative samples of this series of currency which was first put into circulation in Saudi Arabia in the 1983/1984 time-period, on both scaled and unscaled backgrounds. For example, for the 500 Riyal, I have provided these depictions and measurements as Annex 1. I further documented the dimensions of the specific currency using rulers, a digital caliper, and a micrometer from the original notes that I was able to examine.

7. The dimensions and appearance of the currency were further verified to ensure they were consistent with the published dimensions of these three specific banknotes through cross referencing our calculations with The Banknote Book (Saudi Arabia) for notes placed into circulation as of 1983-4.³

8. The length and width dimensions for the currency used in our visualizations were determined to be as follows: 50 SAR (155 x 70 mm), 100 SAR (160 x 72 mm) and 500 SAR (166 x 74 mm).

² CGE examined SAR notes of 1, 5, 100, 500 denominations. A 50 SAR note from the 1983/1984 series was unavailable at the time of note purchase. The notes were in excellent condition (essentially collector grade notes) that did not display typical wear of notes in circulation.

³ The Banknote Book, Saudi Arabia Chapter, pp. 13-14 (A Greysheet Publication, July 16, 2023).

9. Based on the measurements of the currency, digital models of the banknotes for the 50, 100 and 500 SAR were created.⁴ A digital 3-dimensional model of the stack of banknotes was created based on the dimensions described above with the addition of depth by analyzing the thickness of a stack of 100 notes. The depth of the stack of banks notes was determined to be 11.8 mm.⁵ Each stack has 100 Saudi Arabia Riyal banknotes contained within them, each surrounded by digitally recreated thin paper band (the thickness of the paper band is included in the 11.8 mm dimension). The cuboid (rectangular cube) stacks were “textured” with photographic images so that their visual appearance would accurately replicate the actual Saudi Arabia Riyal (“SAR”) currency in question. To compile accurate currency replications, I made use of the same suite of software, analytical and visualization tools that my colleagues and I use in most of the visualization production work we perform. It includes the following industry standard software, Autodesk Maya 2022 and Adobe Photoshop.

10. I then used the software to visualize the two requested amounts of 1,259,430 SAR and 14,798,020 SAR. For the purposes of this assignment, we rounded down the final amount in favor of a smaller sum since the amount was above any available currency we were digitally visualizing. For example, the 14,798,020 was rounded down by removing 20 SAR and visualized in these attached annexes as 14,798,000 Saudi Arabia Riyals (+0, -20 in terms of tolerances on the currency amount). Likewise, the 1,259,430 amount was rounded down by removing 30 SAR

⁴ For the 50 SAR note, CGE relied on the length and width dimensions of the note as published by the Banknote book, and depth dimensions as documented from the measurements of the 1, 5, 100 and 500 notes. CGE reproduced the image of the 50 SAR note from online sources. All notes were reasonably consistent in measurement of thickness.

⁵ The depth of the stack was measured using digital calipers, which produces compression within the stack. Observation and measurement of the depth of the stack varied from a minimum of 11.8 mm, to as great as 14 mm (without the compression of the calipers). Typically the stack was narrowest at the band and flared at the ends of the stack, with air gaps between individual notes. By utilizing a consistent depth of 11.8 mm, the overall height of stacks represents a minimum height for all stacks depth. Real world, actual heights would be greater than 11.8 mm considering the compression in the stack and the condition of the notes.

(for visualizations of the 50 and 100 note) and removing 430 for the 500 note. The amounts are visualized in all corresponding annexes as 1,259,430 Saudi Arabia Riyals (+0, -430 in terms of tolerances on the currency amount).⁶

11. The visualizations or graphics that I have created are true and accurate 3-dimensional models of Saudi Riyal currency for the relevant 50, 100 and 500 Saudi Arabia Riyal banknotes. I have produced graphics that are accurate in scale based on the amounts requested of me in the amounts of 1,259,430 SAR and 14,798,020 SAR.⁷

THE VISUALIZATIONS

11. I have provided three different renderings for how the 1,259,430 SAR would appear, and one rendering for how 14,798,020 SAR would appear. These renderings are provided in Annexes 2-5.

12. Attached here as Annex 2 to my Declaration is a demonstration of what I have labelled as “View A.” This perspective provides a true and accurate visual rendering of 1,259,400 Saudi Arabia Riyals from a desk view depicting what a bank teller would see if this amount was being placed in front of the teller window by a six-foot tall adult. In View A, we have featured five different combinations of currency for alternative views including: (1) views of this amount being presented exclusively in 50 SAR; (2) views of this amount being presented exclusively in 100 SAR; (3) views of the amount being presented exclusively in 500 SAR; (4) “Split 2”- consisting of a view of this amount being presented in an even two-way division between 50 and

⁶ For example, to visualize 1,259,430 SAR in 50 SAR notes CGE utilized 251 complete stacks of 50 SAR notes, and an incomplete stack of 88, 50 SAR notes. The total value of currency depicted was $251*100*50 + 88*50 = 1,255,000 + 4,400 = 1,259,400$.

⁷ As noted previously, the final rendering in the annexes is rounded down to make the piles actually smaller, with 30 to 430 SAR being removed from the 1,259,430 amount, and 20 SAR being removed from the 14,798,020 amount.

100 SAR currency notes; and (5) “Split 3”- consisting of a view of this amount being presented with an even three-way division of the same amount in 50, 100 and 500 SAR currency notes.

13. Attached here as Annex 3 to my Declaration is a demonstration of what I have labelled “View B.” This perspective provides a true and accurate visual rendering of 1,259,400 Saudi Arabia Riyals from a wider view depicting what a bank teller would see if this amount was being placed in the window in front of them by a six-foot tall adult. In View B, we have featured five different combinations of currency for alternative views including: (1) views of this amount being presented exclusively in 50 SAR; (2) views of this amount being presented exclusively in 100 SAR; (3) views of the amount being presented exclusively in 500 SAR; (4) “Split 2”- consisting of a view of this amount being presented of an even two-way division between 50 and 100 SAR currency notes; and (5) “Split 3”- consisting of a view of this amount being presented with an even three-way division of the same amount in 50, 100 and 500 SAR currency notes.

14. Attached here as Annex 4 to my Declaration is a demonstration of what I have labelled “View C”. This perspective provides a true and accurate visual rendering of 1,259,400 Saudi Arabia Riyals sitting on top of a standard table. In View C, we have featured five different combinations of currency for alternative views including: (1) views of this amount being presented exclusively in 50 SAR; (2) views of this amount being presented exclusively in 100 SAR, (3) views of the amount being presented exclusively in 500 SAR; (4) “Split 2”- consisting of a view of this amount being presented of an even two-way division between 50 and 100 SAR currency notes; and (5) “Split 3”- consisting of a view of this amount being presented with an even three-way division of the same amount in 50, 100 and 500 SAR currency notes.

15. Attached here as Annex 5 to my Declaration is a demonstration of what I have labelled “View D”. This perspective provides a true and accurate visual rendering of 14,798,000 Saudi

Arabia Riyals sitting on top of a standard table with a six-foot tall adult standing next to it. In View D, we have featured five different combinations of currency for alternative views including (1) views of this amount being presented exclusively in 50 SAR; (2) views of this amount being presented exclusively in 100 SAR; (3) views of the amount being presented exclusively in 500 SAR; (4) “Split 2”- consisting of a view of this amount being presented of an even two-way division between 50 and 100 SAR currency notes; and (5) “Split 3”- consisting of a view of this amount being presented with an even three-way division of the same amount in 50, 100 and 500 SAR currency notes.

16. I can confirm that all the visualizations and final outputs presented as Annexes to my Declaration are accurate, scaled representations of the SAR currency consistent with current accepted practices of visualization.

I declare under penalty of perjury under the laws of the United States of America that foregoing is true and correct.

Executed on: March 7th, 2024

By: 

Ben T. Railsback

BEN T. RAILSBACK, M.S., P.E.**EDUCATION:**

M.S. Engineering Systems, Colorado School of Mines, Golden, Colorado, 2000

B.S. Engineering, Mechanical Specialty, Minor in Economics, Colorado School of Mines, with high scholastic honors, 1998

REGISTRATION:

Registered Professional Engineer in the State of Colorado (P.E.)

Board Certified in Forensic Engineering by the National Academy of Forensic Engineers (NAFE)

Accredited Traffic Accident Reconstructionist (ACTAR)

Certified by the National Council of Examiners for Engineering and Surveying (NCEES)

Certified XL Tribometrist, Excel Tribometers, LLC

EXPERIENCE:

President and CEO, Critical Guidance Engineering, LLC, Highlands Ranch, Colorado, May 2018 to Present

Director of Mechanical Engineering, Knott Laboratory, LLC, Centennial, Colorado, September 2011 to May 2018.

Manager, Mechanical Engineering, Knott Laboratory, LLC, Centennial, Colorado, April 2005 to August 2011.

Engineer, Knott Laboratory, Inc., Centennial, Colorado, June 2000 to April 2005.

RECONSTRUCTION:

Mr. Railsback performs investigation and reconstruction of high and low-speed motor vehicle accidents involving passenger cars, motorcycles, pedestrians, bicycles and commercial vehicles. His experience includes the use of energy and momentum analysis to determine the speed of vehicles involved in accidents, crashworthiness of vehicles, restraint systems, occupant compartment intrusion, driver reaction, time/space relationships and analyses, as well as headlamp filament examination. Mr. Railsback's investigations often involve analysis of vehicle dynamics, occupant kinematics, vehicle safety, human factors and visibility studies. Frequent aspects of these investigations also involve the evaluation of the performance of brakes, tires, seat belts and airbags. He also has working experience with engine, drive train and suspension failure analysis. Mr. Railsback has also employed reconstruction techniques to analyze shooting incidents, ski accidents, slip, trip and fall accidents, fall protection accidents, window covering injury incidents and industrial accidents.

PRODUCT DEVELOPMENT:

As an engineer with Knott Laboratory and in past employment Mr. Railsback has performed extensive product testing, product development and reporting in a variety of consulting, research, and manufacturing settings. While at Knott Laboratory, Mr. Railsback has assisted private companies in the development of automotive glazing products, and safety equipment for snow mobiles. Mr. Railsback has also designed, developed, and evaluated safety features for window covering products based on extensive research of currently available window covering designs and historical patent documents. In past employment, he has conducted life-cycle testing, including time-to-failure analyses, vibration analyses, stress and strain tests, pressure testing, leak-down testing, and time & frequency domain analyses. While performing research for his graduate thesis, Mr. Railsback gained a thorough understanding of data acquisition techniques and the application of data reduction and error analysis techniques to data from mechanical systems. Mr. Railsback has also gained general engineering experience in the areas of field surveying, general machining, soldering, brazing, welding, wiring and general manufacturing assembly.

SAFETY ENGINEERING:

Mr. Railsback has been involved in extensive investigation and analysis of the safety of mechanical products. Mr. Railsback has applied the principles of safety engineering to the investigation of accidents in the areas of consumer products, sports equipment, window covering products, and material handling equipment such as stand-up and sit-down forklifts, racking systems, and warehouses. Mr. Railsback has also been involved in liability investigation involving construction equipment such as cranes, aerial lifts, front loaders, motor graders, skid steers, mining equipment and various other pieces of machinery. Frequent aspects of these investigations include maintenance, safety engineering, human factors, and incident reconstruction. Mr. Railsback is fluent in the safety engineering aspects of CFR, FMVSS, ANSI, ASME, SAE, ITSDF and other standards applicable in product cases, and is a member of the CSA Technical Committee on Window Covering Products developing CSA standard Z600.

VEHICLE ENGINEERING:

Mr. Railsback was a team member of the Colorado School of Mines, Society of Automotive Engineers (SAE) sponsored, small-scale formula-style race car program for several years. In 1997, Mr. Railsback was part of a team that developed an engine test stand. In 1998, Mr. Railsback was responsible for the optimization and design of a final belt drive system, and as a team member constructed the chassis, suspension, and drive train. Mr. Railsback was the suspension design team leader of the 1999 race car and has designed independent suspension systems and has used computer technology to produce dimensional analysis of suspension geometry.

EXPERT TESTIMONY:

As a result of his investigations and experience, Mr. Railsback has been asked to provide testimony as an expert witness dozens of times. Mr. Railsback has testified for both plaintiffs and defendants and qualified as an expert witness in the areas of mechanical engineering and accident/incident reconstruction.

PROFESSIONAL AFFILIATIONS:

Mr. Railsback is a member of the following technical and professional societies:

NAFE - National Academy of Forensic Engineers	ACTAR - Accreditation Commission for Traffic Accident Reconstruction, Full Accreditation
NSPE - National Society of Professional Engineers	CSA - Canadian Standards Association Technical Committee Z600
SAE - Society of Automotive Engineers	ASME - American Society of Mechanical Engineers

Mr. Railsback has also held multiple leadership positions within NAFE, NSPE, NSPE-CO and SAE. He is a past NSPE Director of the Southwest Region and member of the National Board of Directors and served on the NSPE Executive Committee. He is a past State of Colorado Representative to the NSPE House of Delegates and is a Past President of the State and Central Chapter of NSPE-CO. Mr. Railsback is currently the committee chair of the Accident Reconstruction committee of the NAFE, and a NAFE Director-at-Large, serving on the Board of the NAFE.

BEN T. RAILSBACK, M.S., P.E.**PUBLICATIONS**

1. William H. Pierce and Ben T. Railsback. "Boom Lift Operator Protection From Stored Energy Hazards. ASCE-ASME Journal of Risk and Uncertainty in Engineering Systems Part B: Mechanical Engineering RISK-17-1041. (In Print).
2. Ben T. Railsback, Ricky Nguyen, Steve D. Knapp, and Richard M. Ziernicki. "Forensic Engineering Analysis of Unintended Movement of Powered Industrial Trucks." Journal of the National Academy of Forensic Engineers. June 2018.
3. Steve D. Knapp, Richard M. Ziernicki, and Ben T. Railsback. "Forensic Engineering Analysis of a Motorsports Racing Incident." Journal of the National Academy of Forensic Engineers. Dec 2017.
4. William H. Pierce and Ben T. Railsback. "Boom Lift Operator Protection From Stored Energy Hazards." 2016 ASME International Mechanical Engineering Congress and Exposition IMECE2016-66743. Nov. 15, 2016.
5. Richard M. Ziernicki and Ben T. Railsback. "Forensic Engineering Evaluation and Testing of Horizontal Intrusion Protection Equipment for Stand-Up Forklifts." Journal of the National Academy of Forensic Engineers. Vol. 32, No. 2, December 2015.
6. Richard M. Ziernicki, Ben T. Railsback, Steve D. Knapp, William H. Pierce and Ricky L. Nguyen. "Stand-Up Forklift Egress Times as a Function of Operator Compartment Guarding." 2014 ASME International Mechanical Engineering Congress and Exposition IMECE2014-38847. Nov. 19, 2014.
7. Richard M. Ziernicki, Ben T. Railsback. "Forensic Engineering Investigation of Incidents Involving Corded Window Coverings." Journal of the National Academy of Forensic Engineers. June 2013.
8. Ashley M. Heist, Richard M. Ziernicki and Ben T. Railsback. "Analysis of the Hazards of Wood Chipper Accidents." 2011 ASME International Mechanical Engineering Congress and Exposition. Paper Number IMECE2011-62786. November 2011.
9. Ben T. Railsback and Richard M. Ziernicki. "Stand-Up Forklift Acceleration." 2010 ASME International Mechanical Engineering Congress and Exposition. Paper Number IMECE2010-38940. November 2010.
10. Joseph M. Tremblay, Richard M. Ziernicki, Ben T. Railsback and Mark H. Kittel. "Wind Effects on Dynamic Stability of Tractor Trailers in Winter Conditions." SAE Paper 2009-01-2915. October 2009.
11. Richard M. Ziernicki and Ben T. Railsback. "Re-Construction Using CDR." Proceedings of Forensic Engineering Tools & Techniques "Advanced Accident Re-Construction For Forensic Engineers Series." Presented by the: Education Committee of The National Academy of Forensic Engineers. St. Louis, MO July 2009.
12. Richard M. Ziernicki and Ben T. Railsback. "Forensic Engineering Investigation of Product Liability Cases." Journal of the National Academy of Forensic Engineers. Dec 2008.
13. Ben T. Railsback and Richard M. Ziernicki. "Hazard Analysis and Risk Assessment for the Operators of Stand-Up Forklifts." 2008 ASME International Mechanical Engineering Congress and Exposition. Paper Number IMECE2008-66427. (November 2008).
14. Richard M. Ziernicki and Ben T. Railsback. "Forensic Engineering Assessment of Safety for Stand-Up Forklifts." Journal of the National Academy of Forensic Engineers. June 2008.
15. David A. Danaher, Wendy S. Johnson, Ben T. Railsback and Richard M. Ziernicki. "A New Polycarbonate and Glass Laminate and its Affects on the Relationship Between Residual Tensile Stresses and Impact Resistance of Windshields." Society of Automotive Engineers paper for the International Body Engineering Conference & Exhibition (IBEC) and the Automotive & Transportation Technology Congress (ATT). Paper number 2002-01-1991.
16. Ben T. Railsback. "Development of In-Service Condition Monitoring Sensor for Composite Materials Using Serpentine Continuous Wave Through-Transmission." Colorado School of Mines. Jun. 2000.

TECHNICAL CONFERENCES AND SEMINARS

1. "Slip, Trip and Fall 101." Speaker. Knott Laboratory, LLC. Centennial, CO. 13 April 2018.
2. Aerial Lift Instructor Development. Training. Colorado Safety Association. Denver, CO. 12 April 2018.
3. "The Hyperloop – A New Form of Transportation." National Society of Professional Engineers - Colorado (NSPE-CO). Lakewood, CO. 26 Oct. 2017.
4. "Forensic Engineering Analysis of Unintended Movement of Powered Industrial Trucks." Speaker. National Academy of Forensic Engineers Annual Meeting (NAFE). Atlanta, GA. 22, Jul. 2017.
5. 2017 Professional Engineers Conference. National Society of Professional Engineers (NSPE). Atlanta, GA. 20-21 Jul. 2017.
6. Excel Tribometers Training and Calibration. CXLT Certification. Excel Tribometers, LLC. Denver, CO 27 Jun. 2017.
7. "Train the Trainer." Forklift Operator Certification Training. Colorado Safety Association. Denver, CO 11 May 2017.
8. "Self-Driving Cars." Speaker. Colorado Claims Association. Englewood, CO. 7 Oct. 2016.
9. "The Engineering of Orthopaedic Implants." Presented by Peter J. Laz, Ph.D. National Society of Professional Engineers-Colorado. Denver, CO. 23 Oct. 2015.
10. "Tivoli Brewery Tour & Presentation." National Society of Professional Engineers-Colorado. Lakewood, CO. 29 Sep. 2015.
11. "Anatomy of a Circulator." Taco course. Taco FloPRO University. Denver, CO. Sep. 2015.
12. "Forensic Engineering Evaluation and Testing of Horizontal Intrusion Protection Equipment for Stand-Up Forklifts." Speaker. National Academy of Forensic Engineers Annual Meeting (NAFE). Seattle, WA. 18 Jul. 2015.
13. "Crash Data Retrieval Update." Crash Data Specialists. Colorado State Patrol. Golden, CO. 13-14 Apr. 2015.
14. "Forensic Investigations and Technology." Presented by Angelos Leiloglou. National Society of Professional Engineers. Lakewood, CO. 27 Mar. 2015.
15. "United Launch Alliance." Presented by Brooke Mosley. National Society of Professional Engineers. Lakewood, CO. 25 Sep. 2014.
16. "3D Printing Technology." Presented by Tim Crennen. National Society of Professional Engineers. Lakewood, CO. 27 Mar. 2014.
17. "Drones." Presented by Chris Miser, Falcon UAV. National Society of Professional Engineers. Lakewood, CO. 24 Oct. 2013.
18. "Engineering Investigations of Crane Accidents." Construction Safety & Claims Summit. Willis of Colorado. Presenter. Centennial, CO. 12 Sep. 2012.
19. "Fraud and Low Speed Impact Investigation". Accident Reconstruction Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 24 Feb. 2012.
20. "Forensic Engineering Investigation of Accidents Involving Corded Window Coverings." Speaker. National Academy of Forensic Engineers Annual Meeting (NAFE). Miami Beach, FL. 07 Jan. 2012.
21. "Analysis of the Hazards of Wood Chipper Accidents." 2011 ASME International Mechanical Engineering Congress and Exposition. Presenter. Denver, CO. 15 Nov. 2011.
22. "Forensic Engineering 101: Bringing the CSI Effect to Your Case." Larimer County Bar Association. Presenter. Fort Collins, CO. 27 Oct. 2011.
23. "BOSCH Crash Data Retrieval System ® Data Analyst Course." CDR System Operator Certification. Collision Safety Institute. (CSI). Training and Certification. Longmont, CO. 10-14 Oct. 2011.
24. "Low Speed Impact and Fraud." Colorado Claims Association. Presenter. Englewood, CO. 7 Oct. 2011.

25. "Product Liability." Claims Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 23 Sep. 2011.
26. "BOSCH Crash Data Retrieval System ® Operator's Certification Course Series." CDR Technician Level 1 and Level 2 Course. Collision Safety Institute. (CSI). Training and Certification. Longmont, CO. 1-2 Sep. 2011.
27. "Forensic Engineering 101: Bringing the CSI Effect to Your Case." ABA Young Lawyers Spring Conference. Presenter. Las Vegas, NV. 14 May 2011.
28. "Motorcycle Accident Reconstruction." Accident Reconstruction Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 8 Apr. 2011.
29. "Low Speed Accident Investigation." Accident Reconstruction Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 8 Apr. 2011.
30. "Using the CSI Effect to Your Advantage." Accident Reconstruction Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 8 Apr. 2011.
31. "Reconstructing Crane Accidents." Steel Erectors Safety Association of Colorado. Presenter. Denver, CO. 9 Mar. 2011.
32. "Current Technology In Accident Reconstruction or Using The CSI Effect To Your Advantage." Blockbuster Auto Seminar. Colorado Trial Lawyers Association (CTLA). Presenter. Denver, CO. 28 Jan. 2011.
33. "Stand-Up Forklift Acceleration." 2010 ASME International Mechanical Engineering Congress and Exposition. Presenter. Vancouver, BC. 17 Nov. 2010.
34. "Engineering 101. What is a Forensic Engineer?" Sponsored by Young Lawyer Division of Colorado Bar Association. University of Denver Law School. Denver, CO. 21 Oct. 2010.
35. "Engineering 101. What is a Forensic Engineer?" Colorado Law University of Colorado Law School. Boulder, CO. 13 Oct. 2010.
36. "Current Technology in Accident Reconstruction." Wyoming State Bar 2010 Annual Meeting & Judicial Conference. Presenter. Laramie, WY. 16-17 Sep. 2010.
37. "Forensic Engineering Investigations of Product Liability." Colorado Defense Lawyer's Association (CDLA). Presenter. Denver, CO. 7 Apr. 2010.
38. "Forensic Engineering Investigations of Product Liability." National Association Insurance Women. Presenter. Allied Insurance. Denver, CO. 18 Mar. 2010.
39. "Low Speed Accident Investigation." USAA Insurance Claims Seminar. Presenter. USAA Insurance. Colorado Springs, CO. 17 Mar. 2010.
40. "Forensic Engineering Investigations of Product Liability." USAA Insurance Claims Seminar. Presenter. USAA Insurance. Colorado Springs, CO. 17 Mar. 2010.
41. "Seat Belts and Airbags: Current Technology." USAA Insurance Claims Seminar. Presenter. USAA Insurance. Colorado Springs, CO. 17 Mar. 2010.
42. "Forensic Engineering Investigation of Product Liability Cases." Property Claims Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 19 Feb. 2010.
43. "Forensic Engineering Investigation of Product Liability Cases." Property Claims Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 29 Jan. 2010.
44. "Re-Construction Using CDR." Speaker. Forensic Engineering Tools & Techniques "Advanced Accident Re-Construction For Forensic Engineers Series." Presented by the: Education Committee of The National Academy of Forensic Engineers. National Academy of Forensic Engineers Annual Meeting (NAFE). St. Louis, MO. 16-18 Jul. 2009.
45. "Subrogation of Workman's Comp Claims Associated with Stand-Up Forklifts." National Association of Subrogation Professionals (NASP). Presenter. Hollywood, FL. 3 Nov. 2008.
46. "Hazard Analysis and Risk Assessment for the Operators of Stand-Up Forklifts." 2008 ASME International Mechanical Engineering Congress. Presenter. Boston, MA. 5 Nov. 2008.

47. "State of the Art Technology in Accident Reconstruction." Trucking Boot Camp for the Claims Professional. Presenter. St. Louis, MO. 23 Sep. 2008.
48. "State of the Art Technology in Accident Reconstruction." Trucking Boot Camp for the Claims Professional. Presenter. Aurora, CO. 24 Sep. 2008.
49. "Forensic Engineering Investigation of Product Liability Cases." Presenter. National Academy of Forensic Engineers Annual Meeting (NAFE). Portland, OR. 24-26 Jul. 2008.
50. General Topics in Forensic Engineering. National Academy of Forensic Engineers. Portland, OR. 24-26 Jul. 2008.
51. "2008 ARC-CSI Crash Conference." Collision Safety Institute. Training and Certification. Las Vegas, NV. 2-5, June 2008.
52. "Multi Vehicle Accident Reconstruction." Colorado Springs Claims Association Annual Seminar. Presenter. Colorado Springs, CO. 16 May 2008.
53. "Vehicular Accident Investigation." USAA Insurance Claims Seminar. Presenter. USAA Insurance. Colorado Springs, CO. 17 Apr. 2008.
54. "Accident Reconstruction." CNA Insurance Claims Seminar. Presenter. CNA Insurance. Dallas, TX. 9 Jan. 2008.
55. "Forensic Engineering Assessment of Safety for Stand-Up Forklifts." Presenter. National Academy of Forensic Engineers Winter Convention. San Juan, Puerto Rico. 5 Jan. 2008.
56. General Topics in Forensic Engineering. National Academy of Forensic Engineers. San Juan, Puerto Rico. 4-6 Jan. 2008.
57. "Vehicular Accident Reconstruction and Motorcycle Accident Reconstruction." State Farm Insurance Seminar. Presenter. State Farm Insurance. Englewood, CO. 29 Oct. 2007.
58. General Topics in Forensic Engineering. National Academy of Forensic Engineers Annual Meeting (NAFE). Denver, CO. 28 Jul. 2007.
59. "High Speed Accident Investigation." Country Companies Insurance Seminar. Presenter. Country Companies Insurance. Denver, CO. 23 May 2007.
60. "Low Speed Accident Investigation." Country Companies Insurance Seminar. Presenter. Country Companies Insurance. Denver, CO. 23 May 2007.
61. "Low Speed Accident Investigation." Vehicular Accident Reconstruction Insurance Seminar. Presenter. Knott Laboratory, LLC. Centennial, CO. 22 May 2007.
62. "Vehicular Accident Investigation." State Farm Insurance Seminar. Presenter. State Farm Insurance. Greeley, CO. 20 April 2007.
63. "Vehicular Accident Investigation." USAA Insurance Claims Seminar. Presenter. USAA Insurance. Colorado Springs, CO. 26 July 2006.
64. "Seatbelts & Airbags: Current Technology." Vehicular Accident Reconstruction Insurance Seminar. Presenter. Knott Laboratory LLC. Centennial, CO. 11 May 2006.
65. "Seatbelts & Airbags: Current Technology." Vehicular Accident Reconstruction Insurance Seminar. Presenter. Knott Laboratory LLC. Centennial, CO. 2 Mar. 2006.
66. "Vehicle Accident Reconstruction." Insurance Claims Seminar. Presenter. Knott Laboratory Inc. Centennial, CO. 6 May 2004.
67. "Vehicle Accident Investigation." Insurance Claims Seminar. Presenter. Knott Laboratory Inc. Centennial, CO. 10 Dec. 2003.
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69. "The Tire as a Vehicle Component." Society of Automotive Engineers (SAE). Seminar: International Congress & Exposition. Cobo Hall. Detroit, MI. 6 Mar. 2003.

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72. "Airbag Module Collection." Presenter. Colorado Claims Association. Denver, CO. 4 Oct. 2002.
73. "Airbag Module Data Collection." Presenter. Allstate Insurance. Denver, CO. 1 Oct. 2002.
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75. "EDC Reconstruction." Engineering Dynamics Corporation. Training and Certification. Northridge, CA. 21-25 Jan. 2002.
76. "PC-Crash and PC-Rect." MacInnis Engineering Associates, Ltd. Training and Certification. Las Vegas, NV. 11-12 Jan. 2002.
77. "Motorcycle Rider Course" Motorcycle Safety Foundation. Lakewood, CO. 7 Mar 1999.

MEDIA APPEARANCES

1. Are Colorado Roads Dangerous? Fox 31 News Interview. 16 Nov. 2016.
2. Hazards Posed by Corded Window Coverings. KMGH 7 News Interview. 6 Nov. 2015.
3. Occupant Motion Kinematics in the Back of a Police Transport Van, Similar to the Freddie Gray Incident. Fox 31 News Interview. 11 Nov. 2015.

ANNEX 1.

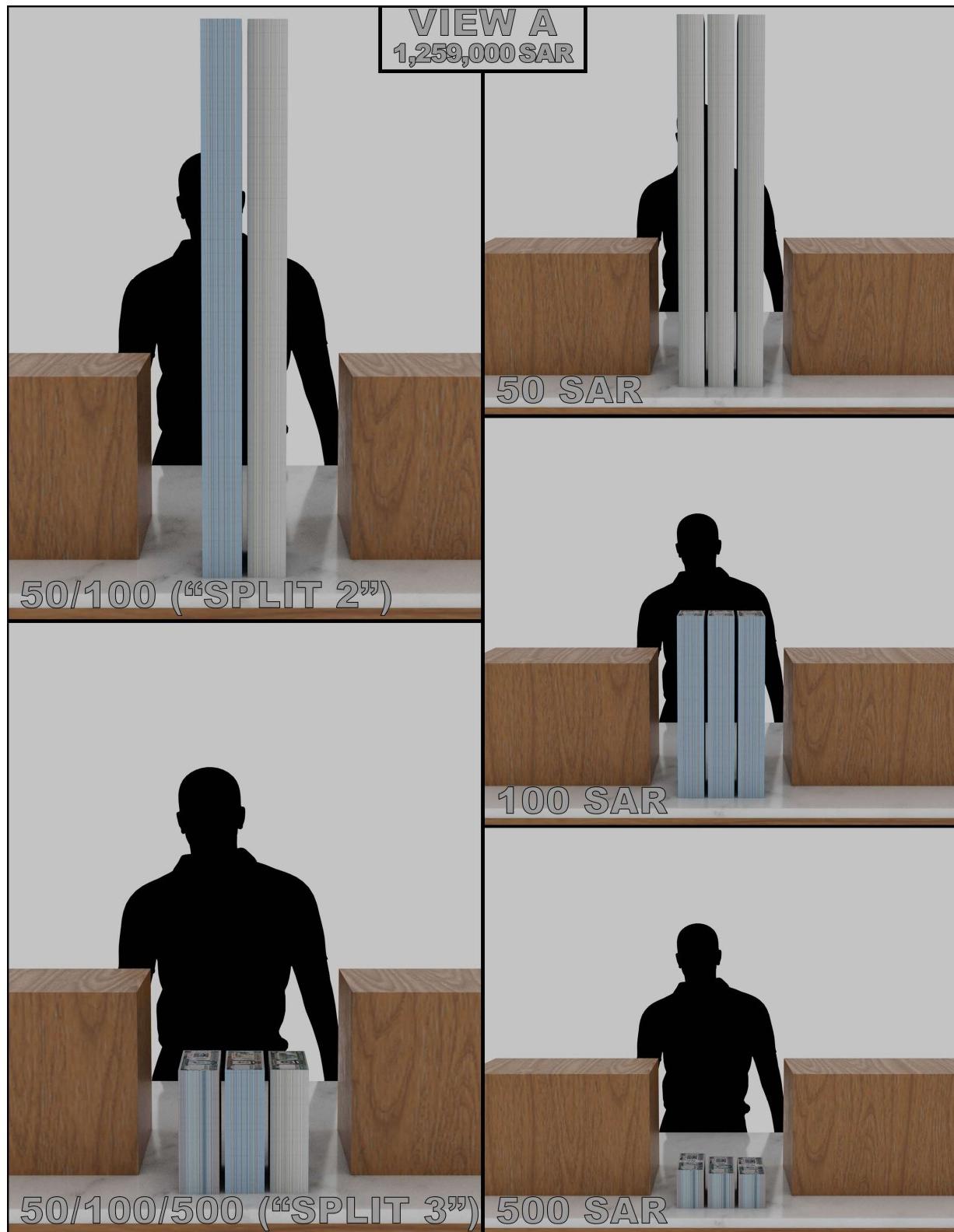
Representative Photographs of Currency Inspection



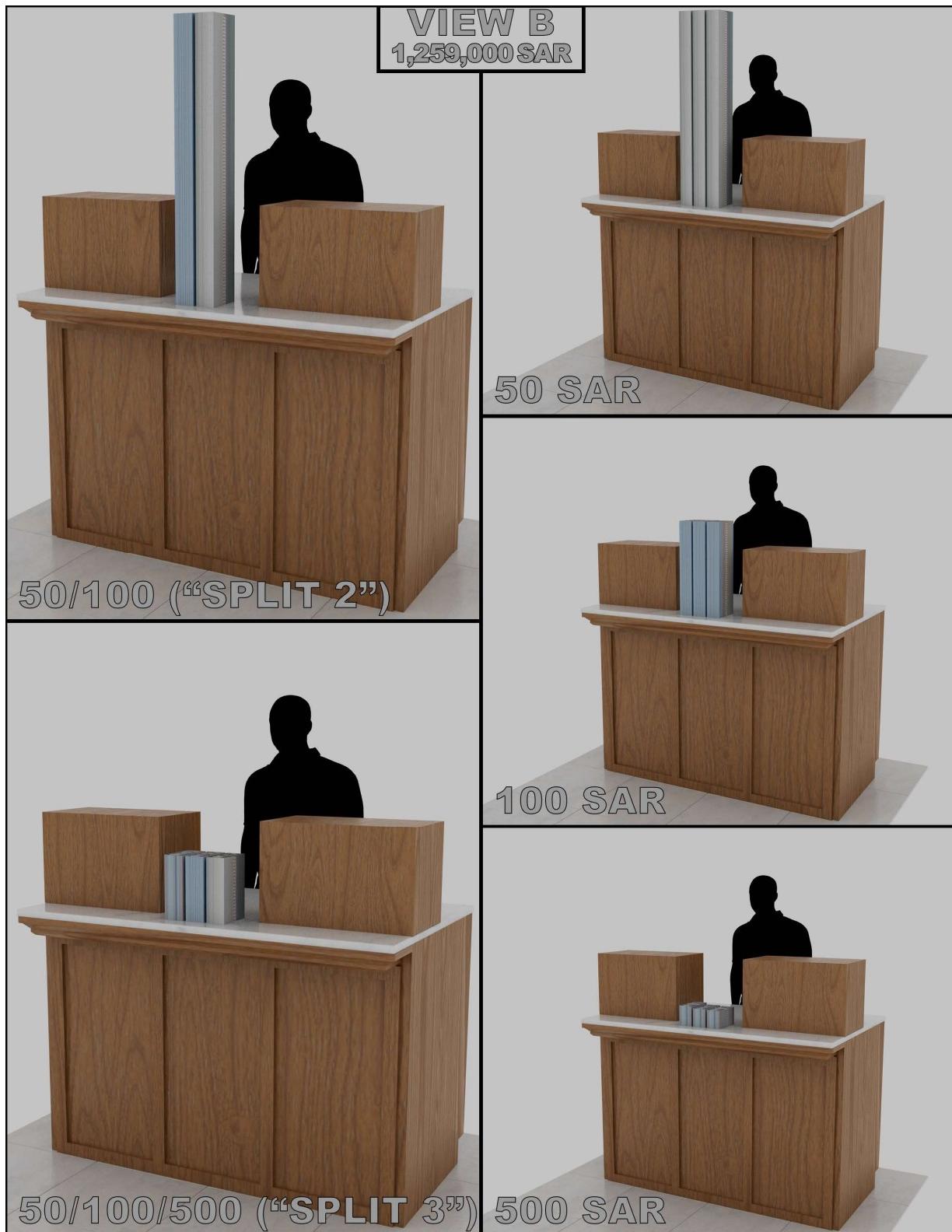
Representative Images of Digital Currency Renderings



ANNEX 2.



ANNEX 3.



ANNEX 4.



ANNEX 5.

